

## Comment Letter AL051



701 LAUREL STREET, MENLO PARK, CA 94025-3483  
www.menlopark.org

August 26, 2004

California High-Speed Rail Authority  
Attn: California High-Speed Train  
Draft Program EIR/EIS Comments  
925 L Street, Suite 1425  
Sacramento, CA 95814

Subject: **City of Menlo Park Comments on Draft Program EIR/EIS**

Members of the Authority:

Thank you for the opportunity to review and comment on the Draft Program EIR/EIS for the proposed statewide high-speed rail project.

While we understand that the nature of a "program" environmental document on a statewide project is inherently general, we wish to bring to your attention specific concerns of the City of Menlo Park that are not adequately addressed in the Draft Program EIR/EIS and that must have "project level" environmental review before the overall program can proceed.

The Draft Program EIR/EIS information on the Menlo Park grade separation issue is limited to a map of northern California extending from the Carquinez Strait to Gilroy entitled *Figure 2.7-5, HST Alignment Options-Profile Characteristics, Bay Area To Merced Region*. This Figure has a single colored line passing through Menlo Park bearing the legend "Slightly Elevated or Depressed". This level of information is inadequate as a description of the grade separation work the Authority intends to undertake. Furthermore, grade separation and expanding the line to four tracks as proposed would necessitate relocation of a historic structure within the Menlo Park rail station complex. The document does not provide adequate information on what right-of-way may have to be acquired in Menlo Park permanently or for temporary construction easements to develop four tracks in the Caltrain alignment and construct the grade separations. Until the HST project defines an explicit horizontal and vertical alignment proposal for tracks and roadways, the City and the affected public in Menlo Park cannot reasonably know what the real impacts of the project are.

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AL051



LEE B. DUBOC  
MAYOR

MICKE WINKLER  
MAYOR PRO TEM

PAUL J. COLLACCHI  
COUNCIL MEMBER

NICHOLAS P. JELINS  
COUNCIL MEMBER

CHARLES M. KINNEY  
COUNCIL MEMBER

The document needs to include additional information on impacts and mitigation measures in relation to noise resulting from High Speed rail operation in the areas of Menlo Park with residential housing near the rail corridor. Other issues of concern to the City of Menlo Park are loss of trees, impact to view corridors, economic impacts to nearby property owners and local traffic circulation. These issues need to be discussed in more detail in the document.

The appearance of overhead electric power supply for the trains, including the wires, supporting poles, mast arms and insulators, is a matter of significant concern for Menlo Park. Any new electrical substations in Menlo Park would also be of concern. The Draft Program EIR/EIS provides insufficient information for the public to determine whether these aspects of the project would be detrimental to Menlo Park. The electrification system proposed for the HST is similar to that proposed for the Caltrain system by the Peninsula Corridor Joint Powers Board (the JPB). On May 25, 2004 Menlo Park filed formal comments on the JPB's Draft EIR for Caltrain Electrification. Menlo Park attaches its letter of comment on the proposed Caltrain Electrification to this letter, and identifies those comments as applicable to the HST Program EIR/EIS.

Although the document indicates the Authority will conduct a project level EIR to the extent needed to assess potential Environmental Impacts not already addressed in this Program EIR/EIS, the fact that the project is being taken to the voters of the state for funding approval on the basis of the Program EIR/EIS document tends to deprive the public of full disclosure of the program's environmental impacts at the time they make their decision on whether to vote funding for the project. The opinions of voters in communities like Menlo Park, that are to be traversed by, and likely to be significantly impacted by the high speed rail project, would be more heavily influenced by the details of local impacts of grade separations, right-of-way acquisition and electrification that are not adequately addressed in the Program EIR/EIS than by the information on statewide travel needs and impacts that the Program EIR/EIS focuses on.

Menlo Park is compelled to comment that while economic issues are not normally addressed in the EIR funding the High-Speed Rail Project with general obligation bonds to be paid from the State General Fund seems inappropriate and irresponsible at a time when the general fund is in a deficit condition and state funding to schools and local government is being squeezed to offset the general fund deficit. At a minimum, Menlo Park urges that any bond obligations on the State General Fund be deferred for several years, and that preferably the project be funded through revenue bonds or with a new direct taxation funding source, not through draw-downs on existing state and local fund resources.

Finally, the City of Menlo Park does not concur in the decision to exclude the Altamont Corridor rail route from further consideration and evaluation in the HST

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cont.

AL051-2

AL051-3

AL051-4

## Comment Letter AL051 Continued

EIR/EIS. It is premature to arbitrarily eliminate an alternative at such an early stage.

The City of Menlo Park does not wish to be in opposition to the Statewide High-Speed Rail Project. However, until the potentially critical local impacts described above are carefully worked out through the design process and evaluated in a project-level EIR/EIS, and until a financing plan that does not compound the difficulties facing local government is developed, Menlo Park cannot declare itself in support of the Project (please see attached Resolution).

Sincerely,

  
Lee Duboc  
Mayor

Attachment: Resolution # \_\_\_\_\_  
Letter of comments on Caltrain Electrification Program

AL051-4  
cont.

RESOLUTION NO. \_\_\_\_\_

**RESOLUTION OF THE CITY COUNCIL  
OF THE CITY OF MENLO PARK  
COMMENTING ON THE CALIFORNIA HIGH SPEED RAIL SYSTEM DRAFT ENVIRONMENTAL  
IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT**

WHEREAS, the California High Speed Rail Authority was established by the Legislature in 1996 for implementing a statewide high speed train system for California; and,

WHEREAS, it is the intent of the State Legislature and the High Speed Rail Authority that a statewide ballot measure to authorize bonds that would fund the project through design and the first stages of construction go to the voters in November of 2006; and,

WHEREAS, the California High Speed Rail Authority has circulated a Draft Program Environmental Impact Report/Environmental Impact Statement on the proposed California High Speed Rail Project seeking comments; and,

WHEREAS, as proposed, the high speed rail line would pass through Menlo Park in the Caltrain corridor, the project would expand the Caltrain line to four tracks, electrify the line, grade separate all crossings, would generate 86 trips a day by the year 2020, and the Authority would perform more specific environmental impact analysis for segments of the rail line and the stations should the high speed train advance to subsequent phases of project development.

NOW, THEREFORE BE IT RESOLVED by the City Council of the City of Menlo Park that:

1. The fact that the project is being taken to the voters of the state for funding approval on the basis of the Program EIR/EIS document tends to deprive the public of full disclosure of the program's environmental impacts. The opinions of voters in communities like Menlo Park, that are to be traversed by and likely to be significantly impacted by the high speed rail project, would be more heavily influenced by the details of local impacts of the project that are not adequately addressed in the Program EIR/EIS than by the information on statewide travel needs and impacts that the Program EIR/EIS focuses on.
2. The project sponsor needs to identify issues of critical concern to Menlo Park at this stage of the project development in order to assure that these issues will be addressed in some depth in subsequent project-level environmental documentation.
3. Funding a \$37 billion project with state general obligation funds seems inappropriate at a time when the State General Fund is in a shortfall condition that is already adversely impacting local governments.
4. The Program EIR/EIS is so general it does not provide adequate information regarding the impacts on right-of-way, noise, historic buildings, trees, businesses, aesthetics and local traffic circulation.
5. Menlo Park would experience staff cost in coordinating the planning, design and construction activities of the high speed train project.
6. Menlo Park does not concur in the decision to exclude further evaluation of the Altamont Corridor rail route, and requests the Authority to revive consideration of that route at this stage of environmental review process.
7. Menlo Park expresses its strong desire for exploring alternate routes and/or methods to avoid the Peninsula area as the alignment for the high speed rail line, i.e. by integrating it with existing systems.

I, SILVIA VONDERLINDEN, City Clerk of the City of Menlo Park, do hereby certify that the above and foregoing Resolution was duly and regularly passed and adopted at a meeting by said Council on \_\_\_\_\_, 2004, by the following vote:

AYES:	Council members:
NOES:	Council members:
ABSENT:	Council members:
ABSTAIN:	Councilmembers:

## Comment Letter AL051 Continued



**PUBLIC WORKS DEPARTMENT**  
701 Laurel Street / Menlo Park, CA 94025-3483  
(650) 330-6740 / Fax (650) 327-5497

May 25, 2004

Caltrain Electrification  
1250 San Carlos Avenue  
San Carlos, CA 94070

**Subject: Caltrain Electrification Program, Environmental Assessment / Draft Environmental Impact Report**

Members of the Peninsula Corridor Joint Powers Board:

Thank you for the opportunity to comment on the Environmental Assessment / Draft Environmental Impact Report on the proposed Caltrain Electrification Program. Menlo Park recognizes that it benefits substantially from Caltrain services and wishes to cooperate with the JPB in improving the quality and efficiency of Caltrain services and operations. However, it must also be recognized that the central portion of Menlo Park is adversely impacted by some of the characteristics of Caltrain operations. As a result, any significant change in Caltrain operations is a matter of considerable public concern. This letter is intended to convey those concerns on behalf of Menlo Park's most directly affected citizens.

After carefully considering the draft document, we believe that there are a number of considerations that must be addressed in more depth before the document would be reasonably adequate for certification.

Our concerns include the following points:

- The project's impact on trees in and near Menlo Park is not sufficiently clear. We understand that there is a detailed arborist's report, but that report has not been directly incorporated in the document. If the content of the arborist's report concerning tree loss in and near Menlo Park is as has been reported in the press (eight to twelve trees at the San Francisquito Creek crossing, fifteen to twenty-two of the fifty-six trees along the tracks in Menlo Park and twenty-five percent of the trees along the tracks in nearby Atherton slated for removal), the DEIR's conclusion of "no permanent impacts" to biological resources may be incorrect. We suggest that this area of the analysis be thoroughly reconsidered, that more specific detail be provided in the report and that consideration be given to transplanting trees rather than removing them. We would also suggest that

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planting new trees be given consideration as mitigation for the loss of existing trees.

- Regarding visual impacts, it seems certain that many in Menlo Park will consider the prospect of catenary wires, insulators, support poles and mast arms, portal support frames in the station areas and higher poles and wires for the distribution system unsightly. And because the impacts of tree removal associated with the project have not been clearly documented in the DEIR (see point above), it is evident that the visual impacts are likely to be more extensive than analyzed in the DEIR. To be a fair indicator of likely visual impact, the DEIR needs additional photo-simulated views that combine the effects of introduction of the electrification overhead gear together with those of the project's tree removal effects. Tree planting and other landscape treatments should be considered as mitigation for the visual impacts created by the project.
- The DEIR claims the potential for substantial noise reduction benefit as the result of electrification. However, in areas near grade crossings, any such benefit would be imperceptible because of the continued impacts of the much more disturbing train horn soundings. In Menlo Park, where there are four grade crossings in the corridor's 1.5 mile traversal of the community and two more, one just north and one just south of City limits, for an average of one grade crossing every quarter-mile, the adjacent land use in Menlo Park along the entire corridor is adversely impacted by train horn noise. Until grade separations or other actions eliminate the routine sounding of train horns at grade crossings, the claimed noise reduction benefits of the electrification project will generally be unperceived by the public. To eliminate the inaccurate portrait of noise reduction benefit that the DEIR currently presents, the document should provide noise contour maps for the alternatives in which the effects of train horn noise are considered as well as the other forms of train noise.
- On page 2-53, the DEIR opines that grade separating the entire system would delay electrification for several years. It also states that grade separating the entire line would increase costs with no commensurate improvement in train service. This particular assertion appears unfounded given that a fully grade separated system is an adopted goal of the JPB. We question this conclusion of the DEIR given the substantial history of grade crossing accidents on the line that grade separations would avert, given the serious disruption to system reliability that results when a rail accident occurs at a grade crossing and given that the claimed noise-reduction benefits of the electrification project generally will not be truly realized until and unless completion of grade separations eliminates the most disturbing noises created by train horns and wayside warning devices. Contrary to the statement of the DEIR, grade separations are obviously not just a benefit-less cost to the rail system. From the perspective of a community that is substantially benefited by Caltrain service but significantly adversely impacted by certain aspects of Caltrain operations that relate to a lack of grade separations (the train horn noise, congestion and safety at the grade crossings) a fair argument can be made that what the JPB should be doing is using first available funding to grade-separate the entire system and using later funding to do the electrification, in which case: 1) the claimed noise-reduction benefits would be realized because the train horn noise would be eliminated and 2) the electric third rail system that avoids all the overhead equipment many people may consider unsightly may prove most practical.

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**Comment Letter AL051 Continued**

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If electrification precedes complete grade separation of the Caltrain line, during any subsequent grade separation project, the electrification gear will need to be moved over to the shoofly and back again to the permanent tracks, an activity that obviously adds complexity, cost and time to any grade separation project. Less obvious but nonetheless significant, aside from moving the electrical system twice, just having to work near the hot wires while doing the ordinary grade separation construction activity will add complexity, time and cost and may also necessitate more intrusive and disruptive temporary construction easements. These are significant considerations for communities that are prospective candidates for grade separations.

- The DEIR notes that the statewide high-speed rail operation that hopes to operate in the Caltrain corridor will need the high voltage overhead type system and that cost-efficiency could be realized by having the Caltrain electrification compatible with it. However, at this point the statewide high-speed rail is nothing more than a speculative project; it is not assured of moving forward. Therefore, it may be premature to lock-in an electrification technology decision on the presumption that high speed rail will be under construction soon to share electrification costs with Caltrain. Caltrain may be wise to defer decision making on the details of electrification until the fate of the statewide high speed rail project is determined. If the statewide high-speed rail project proves a non-starter, Caltrain might be well advised to rely on the less intrusive electric third rail type system rather than the overhead system that high-speed rail would require and that some may regard as unsightly.
- The "Public Services and Facilities" section of the DEIR contains no information about the potential safety risks of the electrified system. What happens when 'hot wires' fall down due to some kind of incident (storm winds, motorist collision with support, etc.)? How quickly does the power get shut off? How frequently do such incidents happen in areas like the Boston to Washington corridor where such systems are operational? The DEIR is completely lacking regarding information of this type. Such considerations should be addressed in the document.

Thank you again for the opportunity to comment on the Draft Environmental Impact Report.

Sincerely,

Kent Steffens  
Director of Public Works

cc: Mayor and Members of City Council  
City Manager  
Community Development Director  
City Attorney  
Town Council Members – Town of Atherton,  
Via: Jim Robinson, City Manager

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**Response to Comments of Lee Duboc, Mayor, City of Menlo Park, August 27, 2004 (Letter AL051)**

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**AL051-1**

The Authority acknowledges the City's concerns. Subsequent project level engineering will define the alignment (horizontal and vertical), right of way, power supply systems, and associated facilities to the extent necessary for identification of specific noise, visual, economic, traffic, and other environmental impacts and mitigations. The level of information provided in the Final Program EIR/EIS is both adequate and appropriate for a program-level EIR/EIS document (please see Section 1.1 of the Final Program EIR/EIS regarding a "program-level" document). Please also see standard response 3.15.13. Additional "photo-simulated" views and impacts on trees are beyond the scope of this program EIR/EIS. Should the HST proposal move forward, visual simulations would be created and impacts on trees would be quantified as part of project-specific studies. The HST system would be fully grade separated and would require complete grade separation of portion of the Caltrain right-of-way utilized by the HST system.

**AL051-2**

Detailed environmental review at the project level (full disclosure of site-specific impacts) is required prior to final design and construction of any portion of the proposed system, regardless of the availability of project funding. It is both adequate and appropriate for a decision to move forward with the HST system to be based on a program-level document. The submittal of a proposal to a vote of the people of the State is exempt from CEQA (CEQA Guidelines Section 15378 (b)(3)).

**AL051-3**

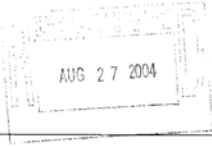
Acknowledged. Issues related to the financing of the proposed HST system are beyond the scope of the program EIR/EIS. The bond funding noted in the comment was proposed in legislation, not by the Authority. Legislative proposals are exempt from CEQA (CEQA Guidelines Section 15378 (b)(1)).

**AL051-4**

Acknowledged. See Standard Response 6.3.1.



## Comment Letter AL052



AL052

August 24, 2004

Draft Program EIR/EIS Comments  
925 L Street, Suite 1425  
Sacramento, California 95814

Re: California High-Speed Rail Project

Thank you for the opportunity to review and comment upon the Draft Program Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the proposed California High Speed Rail System. The City of Tulare supports the concept of high-speed rail service in the State of California. We recognize that the transportation needs of the state will continue to grow rapidly, placing a tremendous strain upon a transportation system that is already heavily utilized. Of the practical alternatives available, high-speed rail offers California the most cost-effective, environmentally friendly choice.

AL052-1

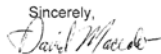
The City of Tulare urges the California High Speed Rail Authority to select the UPRR alignment for the proposed high-speed rail system corridor through the southern Central Valley. This alignment passes through the most heavily populated areas of the region, thereby accommodating the greatest number of potential users. Additionally, the City of Tulare strongly supports the inclusion of a station within the County of Tulare. The draft EIR/EIS indicates a proposed stop in the vicinity of the City of Visalia municipal airport. We concur that this would be an excellent location, as it coincides with the crossroads of the region's two major transportation corridors - State Highway 99 and State Highway 198.

AL052-2

While the City of Tulare is enthusiastic about the prospect of a high-speed rail corridor in our vicinity, we must also recognize the potential detrimental impacts to our community. With the existing UPRR corridor passing directly through the center of Tulare, our citizens must daily live with concerns regarding track safety and noise impacts. The notion of a high-speed train passing through the heart of our community is unacceptable to us. We were pleased to note that a "Tulare Bypass" is under consideration, as indicated by Figure 2.6-38 of the draft program EIR/EIS. The City of Tulare views such a measure as essential to the health and welfare of our citizens, and to the continued vitality of our city.

AL052-3

Once again, the City of Tulare appreciates the opportunity to voice both our support for the high-speed rail concept, and concerns regarding potential impacts to our community. We look forward to working in partnership with all concerned parties to successfully address the transportation needs of our state.

Sincerely,  
  
David Macedo  
Mayor

411 East Kern Avenue • Tulare, California 93274 • 559.684.4200 • Fax 559.685.2398

AN EQUAL OPPORTUNITY EMPLOYER

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**Response to Comments of David Macedo, Mayor, City of Tulare, August 27, 2004 (Letter AL052)**

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**AL052-1:**

Acknowledged.

**AL052-2**

Acknowledged. Please see standard response 6.15.4.

**AL052-3**

Acknowledged. Please see standard response 6.15.4.

## Comment Letter AL053

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**SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT**  
300 Lakeside Drive, P.O. Box 12688  
Oakland, CA 94604-2688  
(510) 484-6000

AL053

August 27, 2004

James Fang  
PRESIDENTDan Richard  
VICE-PRESIDENTThomas E. Margro  
GENERAL MANAGER

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8TH DISTRICTTom Raddeovich  
9TH DISTRICT

Mr. Mehdi Morshed  
Executive Director  
California High Speed Rail Authority  
925 L Street, Suite 1425  
Sacramento, CA 95814

Dear Mr. Morshed:

We are pleased to present you with our comments on the Draft Program Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the proposed California High-Speed Train system. This document marks a historic milestone for the State of California in creating a new transportation system to serve the public. Consistent with the San Francisco Bay Area Rapid Transit District's (BART) comments herein, we support the continued development of an integrated, world-class multi-modal transportation system for the Bay Area and the State of California.

The California High-Speed Train (HST) system proposed in the Draft Program EIR/EIS would connect the cities of San Francisco, Oakland, San Jose, and other Bay Area cities with the state's other large population centers, including Los Angeles, San Diego, Sacramento, and Fresno. Such a system would be beneficial for increasing ridership on BART given that the two systems connect at common stations. We gladly note the importance given to connectivity between the HST and BART as presented in the Draft Program EIR/EIS. In addition to the ridership benefits of connectivity between the two systems, transit-oriented development would be encouraged even more with the presence of both BART and HST at a station.

Our comments on the Draft Program EIR/EIS are presented below in page order except for the first comment that is general in nature. They are given to you in the spirit of improving this document and, ultimately, to improve the HST system and the transportation system in the San Francisco Bay Area.

Since this document is a Draft Program EIR/EIS, we recognize that additional analyses of environmental impacts and mitigation measures will be provided in one or more future project-level EIRs. However, while a programmatic environmental document can defer consideration of issues that cannot feasibly be reviewed at the program level, deferring impact analysis is permitted only where subsequent project-level activities will be examined to determine whether additional analysis is required for impacts not examined at the program level. See CEQA Guidelines sections 15152, 15168. As discussed in the comments below,

BART agrees with the approach taken in the HST Draft Program EIR/EIS to defer analysis of certain impacts until a specific project is proposed, such as effects on existing transit parking and project-generated traffic impacts (pp. 3.1-8, 24). However, the explicit identification of these impacts for project-level analysis appears to suggest that other impacts will not be considered. In particular, other potentially significant impacts of concern to BART, such as effects on existing transit ridership, are not identified as intended for analysis in a Project EIR. Accordingly, we ask that the Final Program EIS/EIR either clarify that each of the issues discussed in our comments below will be analyzed at the project level, or address them at the program level.

Airport Access

On pages 2-13 through 2-16 in the discussion of the No Project Alternative, no mention is made of projects that will significantly improve airport access. For example, two separate projects will facilitate airport access in the Bay Area in the coming years. The Oakland Airport Connector project will provide direct rail service between the Oakland Coliseum BART Station and the Oakland International Airport with revenue service planned for 2010. The Capitol Corridor Intercity passenger rail service will also have a station adjacent to the Oakland Coliseum BART Station. In addition, Santa Clara Valley Transportation Authority (VTA) is proposing an automated people mover to provide service between the San Jose International Airport and the Santa Clara Caltrain Station that is also the site of a proposed BART station. Both projects meet the criteria as laid out on page 2-13 anticipating improvements that would be in place by 2020. Both projects will significantly increase access to the Bay Area's other two airports in much the same way the BART extension to San Francisco International Airport has already demonstrated.

Warm Springs Station

On page 2-50, the Draft Program EIR/EIS states that a HST station at Warm Springs would "include the need to relocate the planned BART station to the east and construct the high-speed rail station and facilities between two active railroads, BART and UPRR." This need to relocate the planned Warm Springs BART Station and the difficulty of doing it while BART is under operating conditions are presented as reasons for eliminating this potential station location. The BART Warm Springs Extension (WSX) alignment in the vicinity of the planned Warm Springs Station is to the east of the eastern-most UPRR tracks (formerly the Western Pacific Railroad). Additionally, VTA has purchased the eastern-most UPRR railroad right-of-way in this vicinity. Please reconsider the analysis of a potential HST station at Warm Springs while accurately considering the planned WSX alignment and active UPRR alignment in this area. For reference, please see the Supplemental Environmental Impact Report, BART Warm Springs Extension, June 2003, which we can provide to you.

Peninsula Alignment

On page 2-51 is found the statement, "For HST service on the San Francisco Peninsula, sharing track with Caltrain is the only realistic alternative for a direct line to San Francisco because of the lack of sufficient available right-of-way along the Peninsula and the high cost of acquiring additional right-of-way." The document does not discuss any possible impacts on BART tracks, systems or stations along the proposed HST alignment. Nor does the document discuss whether the use of the Caltrain right-of-way would prevent a possible

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## Comment Letter AL053 Continued

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extension of BART south of the Millbrae Station. While BART as an agency has no plans for such an extension, the concept has been proposed at various times by elected officials from San Mateo County

**Warm Springs Alignment**

On page 2-52, the Hayward Line to I-880 (Hayward Alignment/I-880) is one of two alignment options in the San Jose-to-Oakland segment that are proposed to be carried forward. The Hayward Alignment/I-880 requires a tunnel under Lake Elizabeth in Central Park of the City of Fremont. BART is currently preparing contract documents for the WSX project, which also tunnels underneath Lake Elizabeth and the active UPRR line, then heads south along the former Western Pacific Railroad line. The Hayward Alignment/I-880 under Lake Elizabeth and to I-880 is not fully described. Please clarify if the Hayward Alignment/I-880 as it proceeds south of Lake Elizabeth to I-880 would parallel the proposed BART WSX, and how far away it would be? Would there be construction or permanent impacts to the existing and planned rail lines? These issues need to be fully analyzed in the Project EIR/EIS and the Program document should recognize this need.

**Ridership Impacts**

On page 3.1-1, the statement appears that under the California Environmental Quality Act a proposed project should be analyzed for the potential effects of various impacts including to rail. Yet, the potential benefits and impacts of access to HST provided by rail transit are not mentioned in the Draft Program EIR/EIS, other than parking impacts (see below). For example, the extent to which existing Peninsula rail passengers (either Caltrain or BART) will migrate to the HST is not addressed. How many of these passengers will now bypass both Caltrain and BART in favor of the HST? The same question arises for HST service on the East Bay between San Jose and Oakland with the potential for BART passengers switching to the HST.

**Parking Impacts**

On page 3.1-8 is the following paragraph relating to traffic and circulation issues for the existing conditions compared to the No Project Alternative;

*"Even though there is sufficient parking planned for the HST stations, one of the greatest effects that HST could have on the existing transit system would be the potential use of existing transit parking facilities by HST passengers. At all Caltrain stations other than the Millbrae Station, and at affected San Francisco Bay Area Rapid Transit District (BART) stations such as West Oakland, 12<sup>th</sup> Street, Coliseum, and Union City in the East Bay, there is sufficient parking under existing conditions. In downtown San Francisco and Oakland, as well as at the three major airports, there currently is no excess parking. Parking conditions at these locations are expected to remain the same or improve under the No Project Alternative because Caltrain and BART capital expansion programs include parking expansions and the programs are likely to continue to adjust to market demands. However, HST riders could potentially use existing transit parking facilities, resulting in parking impacts."*

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While it is true that BART will make adjustments in providing access to our stations to meet future market demands, we do not have a specific capital program to expand parking capacity at our existing stations. Proposed BART extensions do include parking facilities but only to meet the needs of the specific project. It also should be noted that BART does not have parking facilities at the Oakland City Center-12<sup>th</sup> Station. Please note that the West Oakland BART Station is one of the most popular park-and-ride stations in the BART system and does not meet the existing demand for parking. According to a May 2004 survey, the non-fee spaces in the West Oakland parking lot filled at 5:45 a.m.

We want to reinforce the statement above that one of the greatest effects that HST service could have on existing transit systems is the use of existing transit parking facilities by HST passengers. This impact would be not only at common stations to the BART and HST systems but also at other BART stations where riders park and use BART to access the HST. Such a parking analysis of all BART stations was performed by Santa Clara Valley Transportation Authority in the BART Extension to Milpitas, San Jose and Santa Clara Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) & Draft 4(f) Evaluation of March 2004. Given that this EIR/EIS is at a program level and specific forecasted ridership estimates are not presented, we do not know the level of significance of this impact. The Program EIR/EIS should consistently commit to analyzing the impacts on existing transit parking facilities by HST passengers yet the statement on page 3.1-15, quoted below, suggests that the HST Alternative will not have an impact on rail transit service.

**Core System Impacts**

On page 3.1-15 in a discussion of Transit, Goods Movement, and Parking, the Draft Program EIR/EIS states, "The HST Alternative is not projected to have any potential impact on public transit conditions compared to the No Project Alternative." The HST Alternative, however, does anticipate a range between 15.2 and 33.2 million annual trips to San Francisco. This range excludes trips from San Joaquin Valley cities because their destinations are not distinguished between Los Angeles and San Francisco as presented in the document. An influx of this magnitude onto the Bay Area transit system, including BART, would require additional analysis in terms of its effect on capacity and access to the system. The potential parking impacts at BART stations not connected to the HST system are already noted above. Other BART facilities in addition to our parking supply could potentially be affected by the increased ridership from the HST. The passenger loads on station platforms, the safety of vertical circulation elements through our stations, passenger crowding on our trains and other system components could be affected by HST ridership in the future. As BART plans for future riders, analysis has indicated that given forecasted growth to 2025, the capacity of the BART overall system will need to be upgraded to maintain BART standards for operational performance and passenger safety.

**Rail Transit Access**

On page 3.1-24 under Mitigation Strategies, is found the statement, "Consultation and coordination with public transit services in order to encourage the provision of adequate bus feeder routes to serve proposed station areas could mitigate potential transit impacts." The provision of rail transit services could mitigate potential impacts of HST service and is missing from this statement.

AL053-8  
cont.

AL053-9

AL053-10

## Comment Letter AL053 Continued

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P.6

**BART Connection at Diridon**

On page 3.2-37 is text on the implications of splitting the HST route in San Jose to serve both San Francisco and Oakland. It states, "However, if only one side of the Bay were directly served by the proposed HST system, the number of intermodal connections would be greatly reduced." Later in the paragraph it states, "Potential HST passengers from the East Bay would have to either use the Capitol Corridor, mass transit, or drive to San Francisco, San Jose, or the Peninsula to use the HST service."

BART is supportive of the East Bay alignment given the various possible intermodal connections between the HST and the BART system. However, mention should be made of the proposed Silicon Valley Rapid Transit Project because it includes a BART station at the Diridon Station in San Jose where HST would also have a station. A description of this proposed BART station is contained in the BART Extension to Milpitas, San Jose and Santa Clara Draft EIS/EIR.

AL053-11

**Transbay Terminal Connection**

On page 3.2-38 is a discussion of a HST station at the proposed new Transbay Terminal Station in San Francisco. It states, "In addition, the Transbay Terminal would serve as the transit hub for all of the major services to downtown San Francisco, with the advantage of direct connections to BART and Muni." Unfortunately, there is no direct connection between BART and the Transbay Terminal as it is presently designed. BART is located one city block away from the current and future Transbay Terminal. The proposed new Transbay Terminal does include an unfunded plan to have an underground moving sidewalk to connect to the Embarcadero BART Station.

AL053-12

Thank you for the opportunity to present comments of the Draft Program EIR/EIS for the proposed HST system. We are excited by the prospect of the California High Speed Rail Authority developing a new statewide rail system to meet the needs of California citizens in the twenty-first century. Please do not hesitate to contact me or Malcolm Quint at 510-464-7677 should you have any questions or concerns about the comments made in this letter.

Sincerely,

  
Thomas E. Margro  
General Manager

cc: Board Appointed Officers

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**Response to Comments of Thomas E. Margro, General Manager, San Francisco Bay Area Rapid Transit District (BART), August 30, 2004 (Letter AL053)**

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**AL053-1**

Acknowledged. Please see standard response 2.1.12.

**AL053-2**

Section 3.1.6, has been revised in the Final Program EIR/EIS to include the assessment of potential effects on existing transit ridership as a part of future subsequent analysis.

**AL053-3**

Section 2.4 No Project Alternative does not address specific improvement projects in the text or tables. Instead, the highway, aviation and conventional passenger rail improvement projects that are included in the No Project Alternative are referenced in Appendices 2A, 2B, and 2C, respectively. The Capitol Corridor Oakland Coliseum Station is included among the Conventional Passenger Rail Improvements in Appendix 2C. However, similar to other local rail transit improvements, the Oakland Airport Connector project is not included in the No Project Alternative for this Program EIR/EIS, because it primarily will serve local travel. Instead, it is included in the projects for cumulative analysis. Because of this project's relevance to access to the Oakland airport, a reference to the project has been added to Section 2.4.2 in the Final Program EIR/EIS. The San Jose International Airport to Santa Clara Caltrain Station Automated People Mover project does not meet the criteria for inclusion in the No Project Alternative in terms of programming and funding, and therefore was not included.

**AL053-4**

The Authority has identified a potential station at Union City to serve Southern Alameda County and noted that future studies may include other concepts in the vicinity of the future Warm Springs BART station (please see Chapter 6A the Final Program EIR/EIS). The

Authority has identified a broad corridor between the Bay Area and the Central Valley containing a number of feasible route options and has proposed further study to identify a single preferred alignment option. This corridor is generally bounded by (and includes) the Pacheco Pass (SR-152) to the south, the Altamont Pass (I-580) to the north, the BNSF Corridor to the east, and the Caltrain Corridor to the west. The Authority will not pursue alignment options through Henry Coe State Park and station options at Los Banos.

Future studies would include consideration of: (1) how and where the HST alignment from the Bay Area would connect with the HST alignment in the Central Valley; (2) how and where the HST alignment would enter the Bay area and would connect to Bay Area termini; (3) the location of stations within these segments.

**AL053-5**

At a conceptual level of detail of engineering, the HST/Caltrain infrastructure was designed so that it would not impact BART tracks, systems or stations along the proposed HST alignment. Determining whether the use of the Caltrain right-of-way would prevent a possible extension of BART south of the Milbrae Station is beyond the scope of this program EIR/EIS process. However, the document has identified that the right-of-way is very constrained, and that a new separate double-track guideway would not fit within the existing right-of-way. The conclusion of the screening evaluation was that such a configuration would require high elevated structures, and was not considered to be practicable (see Section 2.6.9, Draft Program EIR/EIS).

**AL053-6**

The I-880 alignment under Lake Elizabeth is assumed to be parallel to the proposed BART alignment over 100 feet from the BART tunnels). There are not expected to be any construction or permanent impacts to the existing or planned rail lines as a result of

the HST tunneling. These issues would need to be fully analyzed in future project level studies should the HST proposal move forward.

**AL053-7**

Forecasting the extent to which Caltrain or BART passengers might migrate to the HST system is beyond the scope of this program EIR/EIS process. Nevertheless, the HST system and these local/regional commuter services are different and very complimentary, largely serving different transportation markets. The HST service is focused on intercity trips between regions and not shorter distance commuter trips. The HST system would be priced so that revenue from passengers would exceed operational and maintenance costs, whereas commuter services offer much lower fares to attract automobile commuters. Ridership for local and regional transit systems (such as BART and Caltrain) would be expected to increase since these systems would connect to the HST system at multi-modal hub stations and would be attractive as “feeder” services to the HST system. Potential ridership impacts from the HST system on local and regional transit would be evaluated as part of future project specific studies in the Bay area, which is when specific connection and coordination with these other services can be addressed.

**AL053-8**

Should the HST proposal move forward, the Authority will analyze in detail the impacts on existing transit parking facilities by HST passengers as a part of future project specific studies. Section 3.1 has been revised to reflect the potential for the HST Alternative to have potential impacts on public transit conditions in terms of parking and patronage levels as compared to the No Project Alternative. Potential parking and public transit facility impacts would be identified in subsequent project level environmental review.

Subsequent project level environmental review will address potential impacts on existing transit system's parking and patronage. The Final Program EIR/EIS has been revised to reflect the following

statement regarding existing transit systems: “The HST Alternative may have potential impacts on public transit conditions in terms of parking and patronage levels as compared to the No Project Alternative.”

**AL053-9**

Acknowledged. Should the HST proposal move forward, future project level studies will need to address in detail the potential impacts to BART and other local and regional transit systems, including impacts to transit parking. The range of annual HST trips to San Francisco (boardings and alightings) for the HST ridership and revenue forecasts includes trips to/from the San Joaquin Valley cities (please see the CRA ridership reports referenced in the Draft Program EIR/EIS). Section 3.1 has been revised to reflect the potential for the HST Alternative to have potential impacts on public transit conditions in terms of parking and patronage levels as compared to the No Project Alternative. Potential parking and public transit facility impacts would be identified in subsequent project level environmental review.

**AL053-10**

The referenced sentence on Section 3.1.6, has been revised to include rail transit services.

**AL053-11**

The reference sentence includes mention of mass transit without naming the specific facilities or improvement projects.

**AL053-12**

The final program EIR/EIS has been revised to reflect the potential nature of a connection of BART to the Transbay Terminal as currently planned.